



# SLITHY RESOURCES

*hypermedia design for the Macintosh.*

4730 Pine Street, Suite B4  
Philadelphia, PA 19143

DOCKET FILE COPY ORIGINAL RECEIVED

JAN 25 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

January 19, 1993

Ms. Donna Searcy, Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

RE: Comments in MM Docket 92-266

Dear Ms. Searcy,

The FCC requested comment on whether it should establish preferential leased access channel rates for not-for-profit programmers. (NPRM paragraph 153.) Slithy Resources urges the FCC to set preferential non-profit rates for leased access channels.

Slithy Resources designs and develops multimedia resources for electronic publishers. In the coming decade, distinctions between film and video and other forms of digital communication are going to become less distinct, as educators and consumers gain access to tools for consuming and disseminating information across the digital spectrum. It is essential that inexpensive access be preserved for alternative, community-based programmers within each portion of that spectrum.

New non-profit networks and local channels would be able to expand the availability of programs aimed at meeting the needs of under-served communities with cultural, informational, and educational programming. This would make possible an expansion of programming geared towards communities currently ignored by commercial networks.

The emergence of these services would rely on the ability to gain access to "leased access" channels through low rates. Congress mandated "leased access" channels to insure the diversity of information sources for the public. Non-profit programmers are uniquely capable of meeting this need.

Sincerely,

Terry Harpold  
President, Slithy Resources

No. of Copies rec'd \_\_\_\_\_  
List A B C D E



COMMUNICATIONS OF WILLSBORO

RECEIVED

DOCKET FILE COPY ORIGINAL

JAN 25 1993

FCC MAIL ROOM

6 ESSEX ROAD P.O.BOX 625

WILLSBORO, NY 12996

(518)963-4116

Jan. 20, 1993

Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED

JAN 26 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To the Commissioners,

These comments are in regards to MM Docket 92-266,  
section II subsection f "Small Systems Burdens"

I write these comments as a small system operator. My Mother, Father and I operate a small cable system in the rural Northern part of New York State. We have less than 400 subscribers and have been in operation for approximately four and a half years. We introduced cable television to the Towns of Willsboro and Essex, N.Y. The fact the cable television service was deregulated allowed us to bring service to this sparsely populated area. It is with much concern for our subscribers and future subscribers that we look at the impact of the Cable Act of 1992 and how it will impact the services that we offer.

Our costs are higher to provide cable service to subscribers as compared to large systems. The number of subscribers that we serve per pole is on the order of 1.2 subs per pole. This ratio is much lower than urban or suburban cable systems with much higher density to spread out the costs of pole rental. Our pole rental rates have increased 100% in the past four years. As we expand into lower density area's with more seasonal subscribers, the pole rental rates per subscriber will increase.

Our programming costs are higher than the large MSO's. We do not receive volume discounts on some of the most expensive/popular programming such as CNN, ESPN and USA Network. These programmers have refused to offer their programming through a Cable Co-operative that we belong to.

In regards to averaging subscriber counts for small system status verses fixed numbers, we feel that it is better to have the average system as seasonal subscriber could swing a system back and forth from one size to another. In our case, we expect to see our subscriber numbers change by 25% from winter to summer. A 12 month average would smooth out temporary increases and decreases in subscriber count.

We are very concerned about retransmission fee's that may be charged by the broadcasters. We feel that broadcasters will treat small systems as cable programmers have-paying much higher fee's for the same programming.

No. of Copies rec'd 0+9  
List A B C D E

TWO

Although there is discussion of barter arrangements between cable systems and the broadcasters, we don't have any of the tools to barter with such as cross-channel promotion or news gathering ability. In the interest of our subscribers who will eventually pay for any retransmission fee's that are charged, perhaps a lump sum should be implemented for small systems to satisfy these fee's. Fox Net (the white area Fox Network service) presently charges us a flat fee as we are under 1000 subscribers. We carry Fox Net directly without commercial insertion, the same way that we carry the off-air broadcast stations.

In conclusion, we ask the Commission to look carefully at all the issues that this law will have on small system operation in terms of programming costs, operating costs, increased technical requirements, and the limitations that small systems face in generating revenue. As the paper "Competition, Rate deregulation and the Commissions policy relating to the Provision of Cable Television service" pointed out, small systems have historically charged less for cable television service as compared to large cable systems. We will work to keep it that way.

If there are any questions that I can answer regarding these comments or any clarifications that I can make to the reader, I can be reached on 518-963-4116.

Respectfully submitted,



Herb Longware

Cable Communications of Willsboro, Inc.

slf/

9 copies to the Commissioners



# CITY OF BANDON

P.O. BOX 67  
BANDON, OREGON 97411  
PHONE (503) 347-2437

RECEIVED

JAN 26 1993

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

January 22, 1993

DOCKET FILE COPY ORIGINAL

RECEIVED

JAN 25 1993

FCC MAIL ROOM

Office of Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, D.C. 20554

Re: Uniform Rates for Cable System  
MM Docket No. 92-266

Gentlemen:

You are currently considering "Uniform Rates" for Cable Systems under the Cable Television Consumer Protection and Competition Act of 1992. In order to implement the intent of Congress the City of Bandon urges you adopt the broadest feasible rule defining uniform rates "throughout the geographic area in which cable service is provided over its cable system".

The purpose of this rule is to prohibit "predatory pricing" which has been used to stifle competition. In order to further the objectives of the 1992 Act the FCC should require "uniform rates" over the area served by the same head-end facility or franchise area, whichever is larger, unless the franchisee agrees to limit the "uniform rate" areas to the smaller area.

This rule would provide maximum protection from "predatory pricing" while allowing the local franchisee to adjust the rule in the franchise to handle local circumstances. Any rule must have the flexibility built in to be able to adjust to local circumstances or it will not be effective in the maximum number of circumstances. No rule will solve all possible scenarios, but if it is a subject of local franchise negotiations the rule will best fit local circumstances and enhance to Congress' object to increase competition in Cable TV service.

Sincerely,

CITY OF BANDON

*Ben M. McMakin*

Ben M. McMakin  
City Manager  
fhs

No. of Copies rec'd  
List A B C D E

049

# HEADLANDS CENTER FOR THE ARTS

DOCKET FILE COPY ORIGINAL

19 January 1993

RECEIVED

RECEIVED

JAN 26 1993

JAN 25 1993

Ms. Donna Searcy, Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

FCC - MAIL ROOM

RE: Comments in MM Docket 92-266

Dear Ms. Searcy:

The FCC has requested comments on establishing preferential leased access channel rates for nonprofit programmers. Headlands Center for the Arts would like to urge the FCC to do just that.

Commercial networks are not capable of serving all of the community needs and not at all capable of serving the needs of locally based programmers or the artists who work at Headlands. Headlands supports artists in the earliest creative stages of their work and we would like to know that there is a wide spectrum of outlets for their work. That is not now the case. Having a mandated preferential leased access program for nonprofits would begin to fulfill this need.

We are interested in the broadest possible community access to our nation's airwaves to ensure a wide range of points of view for our broad American public. There are a number of underserved communities for whom this mandate would provide access: Native Americans, elderly, children, various other ethnic communities.

I urge the FCC to establish preferential leased access channel rates for nonprofit organizations. It can only help in creating a more interesting and lively cultural heritage for the United States.

Sincerely yours,

Jennifer Dowley  
Executive Director

2 of Copies rec'd  
CJABODE

92-266/ 1/20/93

TO  
RECEIVED FROM IT MAY CONCERN

DOCKET FILE COPY ORIGINAL

JAN 25 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

AM Appaled that this issue even demands

DEBATE. INTERESTING & MOST IMPORTANTLY, Educational  
PROGRAMING IS BEING DROWNED IN THE COMMERCIAL  
COMPETITION THAT FLOODS THE MINDLESS ARRAY OF CHOICES  
ON CABLE ACCESS CHANELS. IF THE FCC IS LOOKING  
OUT FOR THE INTERESTS OF THE AMERICAN POPULACE  
IT SHOULD REGULATE A TOP LIMIT FOR EDUCATIONAL,  
NON-COMERCIAL, & PUBLIC INTEREST PROGRAMING FEES ON  
CABLE NETWORKS. ~~OUR~~ OUR CHILDREN ARE LEARNING FANTASY,  
COMMERCIALISM, & SENSATIONALISM FROM THE T.V.  
BECAUSE THAT IS ALL THAT IS AVAILABLE.  
IT'S TIME THE FCC INTERVEINES; GUNS,  
BOMBS, & SEX ONLY GO SO FAR. GIVE THE ~~THE~~  
NON-COMERCIAL PROGRAMING A CHANCE TO COMPETE  
FOR OUR CHILDRENS' & OUR OWN SHORT, UNEDUCATED  
ATTENTION SPANS. MAY BE THE 4 1/2 HOURS  
THAT THE AVERAGE AMERICAN SPENDS IN FRONT  
OF THE T.V. WON'T JUST BE WASTED TIME.

SINCERELY,

H. HOOVER  
34 WEST 37<sup>TH</sup> ST  
N.Y.C. 10018

MS. DONNA SEARCY, SECRETARY  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M STREET NW  
WASHINGTON, D.C. 20554  
RE: COMMENTS IN MM DOCKET 92-266